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CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Viktor Lisynak,
Defendant.

NO. CR-15-8156-PCT-SPL (ESW)

INDICTMENT

VIO: 18 U.S.C. § 875(c)
(Interstate Threats)
Counts 1-5

THE GRAND JURY CHARGES:

COUNT 1

On or about April 15, 2015, in the District of Arizona, the defendant, VIKTOR LISNYAK, did knowingly and willfully transmit in interstate and foreign commerce, from the State of New York, to the State of Arizona, a telephonic communication to Marshall Elementary School in Flagstaff, Arizona, and the telephonic communication contained a threat to injure another person, that is, "I want to hurt hundreds of children. I'm in the building. I have a gun."

In violation of Title 18, United States Code, Section 875(c).

COUNT 2

On or about April 16, 2015, in the District of Arizona, the defendant, VIKTOR LISNYAK, did knowingly and willfully transmit in interstate and foreign commerce, from the State of New York, to the State of Arizona, a telephonic communication to Knoles Elementary School in Flagstaff, Arizona, and the telephonic communication contained a

1 threat injure another person, that is, "I want to come into your school and kill children."

2 In violation of Title 18, United States Code, Section 875(c).

3 **COUNT 3**

4 On or about April 20, 2015, in the District of Arizona, the defendant, VIKTOR
5 LISNYAK, did knowingly and willfully transmit in interstate and foreign commerce, from
6 the State of New York, to the State of Arizona, a telephonic communication to Mount Elden
7 Middle School in Flagstaff, Arizona, and the telephonic communication contained a threat to
8 injure another person, that is, "I can see children! I'm going to kill children! I am in the
9 school and I want to kill myself."

10 In violation of Title 18, United States Code, Section 875(c).

11 **COUNT 4**

12 On or about April 20, 2015, in the District of Arizona, the defendant, VIKTOR
13 LISNYAK, did knowingly and willfully transmit in interstate and foreign commerce, from
14 the State of New York, to the State of Arizona, a telephonic communication to Flagstaff
15 Cooperative Preschool within Marshall Elementary School in Flagstaff, Arizona, and the
16 telephonic communication contained a threat to injure another person, that is, "I want to kill
17 hundreds of children. I want to kill hundreds of children. I am in the school and I want to
18 kill myself."

19 In violation of Title 18, United States Code, Section 875(c).

20 **COUNT 5**

21 On or about May 7, 2015, in the District of Arizona, the defendant, VIKTOR
22 LISNYAK, did knowingly and willfully transmit in interstate and foreign commerce, from
23 the State of New York, to the State of Arizona, a telephonic communication to Mount Elden
24 Middle School in Flagstaff, Arizona, and the telephonic communication contained a threat to
25 injure another person, that is, "I'm going to kill myself, I'm going to kill your children, and
26 I'm on the roof of your school." The threat included that the caller possessed firearms and
27 an "attack was imminent."

1 In violation of Title 18, United States Code, Section 875(c).

2
3 A TRUE BILL

4 s/
5 FOREPERSON OF THE GRAND JURY
6 Date: July 21, 2015

7 JOHN S. LEONARDO
8 United States Attorney
9 District of Arizona

10 s/
11 CAMILLE D. BIBLES
12 DIMITRA H. SAMPSON
13 Assistant U.S. Attorneys
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